Jeremy Haas - Item 9 - Modification of California Water Code Section 13225 Directive for Aliso Creek Watershed

From: "Rick Wilson" <rwilson@surfrider.org>
To: <rb9agenda@waterboards.ca.gov>
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Subject: Item 9 - Modification of California Water Code Section 13225 Directive for Aliso Creek Watershed
CC: <JHaas@waterboards.ca.gov>

The following comments are submitted on behalf of the Laguna Beach Chapter of Surfrider Foundation concerning Item 9 on the agenda of the Regional Water Quality Control Board, San Diego Region at its meeting of October 12, 2005.

The Laguna Beach Chapter of Surfrider Foundation has been concerned about poor water quality in Aliso Creek and degraded environmental conditions in the Aliso Creek Watershed for nearly 15 years. Many of our members who frequent Aliso Beach are directly affected by the high bacteria concentrations at Aliso Beach that are the result of polluted runoff from Aliso Creek.

Members of the Laguna Beach Chapter have conducted independent water quality monitoring testing in Aliso Creek and at Aliso Beach. We have participated in many years of stakeholder meetings for the Aliso Creek watershed and have been frustrated with the lack of progress in improving water quality. We have advocated for measures to eliminate sewer spills and reduce urban runoff pollution with the "co-permittees" in the watershed, as well as with South Coast Water District, South Orange County Wastewater Authority, and the San Diego Regional Water Quality Control Board.

We have reviewed the data and reports generated in response to the California Water Code 13225/13267/13383 Directive for the Aliso Creek Watershed and we agree that the current monitoring program appears to have reached the point of diminishing returns and therefore does not appear to be a cost effective means of developing and implementing an action plan to address elevated bacteria levels in Aliso Creek. This is particularly true given the current NPDES MS4 permit and the pending TMDL for bacteria.

Therefore we agree with the general concept of revising the 13225 Directive monitoring program to focus it on the monitoring necessary to evaluate BMP effectiveness and monitor for long-term change. However, we have several concerns and recommendations regarding the specific proposed changes:

- We believe that there should be some continued monitoring in winter (we suggest January and February) to complement the summer monitoring and evaluate seasonal differences. Also, water contact recreation occurs year round at Aliso Beach at the bottom of the watershed.
- We recommend addition of a monitoring point in Aliso Creek somewhere in the vicinity of the Coast Highway bridge near Aliso Beach. The proposed monitoring plan does not evaluate the potential influence of runoff from the Aliso Creek Golf Course, a major property in the lower Aliso Creek Watershed. Furthermore, without this downstream monitoring point the monitoring plan would have no way to directly assess the water quality impacting the ocean at Aliso Beach.
- Since the impacts of urban runoff-derived non-natural creek flow extend well out into the Pacific Ocean, it is important to acknowledge that the Aliso Creek Watershed does not end at the shoreline, and that any monitoring program should include a component to monitor for the water quality and biological effects of the creek flow.
- The proposed monitoring plan and associated documents focus on compliance with REC 1 water quality standards designed to protect human health. It should not be forgotten that the ecological effects of increased non-natural water flow and elevated bacteria concentrations should also be evaluated and corrected.
- We believe that an important component in assessing progress is the measurement of flow in storm drains and in Aliso Creek. It should be a stated goal of any Aliso Creek monitoring effort to reduce non-native flows and to use dry weather flow reduction as a key metric in measuring progress.
- As mentioned in staff's Technical Report, pages 8 and 9, there are several major storm drains that are not included in the proposed monitoring plan. Comparing the proposed plan with the list of storm drains ranked by load, flow, and input concentration (see Table B-1 in Supporting Document No. 5) indicates that the "worst case" storm drains in each category are not included in the proposed monitoring plan. Accordingly, Surfrider recommends that drains

J02P08 (#1 in load and #2 in flow), J03P02 (#2 in load and #1 in flow) and J01P27 (#3 in load and #1 in concentration) be added to the plan. We believe that the most progress can be achieved be reducing flows and/or bacteria concentrations in these drains.

Thank you for consideration of these comments.

Rick Wilson
Chairman, Laguna Beach Chapter
Surfrider Foundation
668 N. Coast Highway, #266
Laguna Beach, CA 92651
(949) 492-8170